

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

ZOYA KOVALENKO,

Plaintiff,

v.

KIRKLAND & ELLIS LLP, et al.,

Defendants.

Case No. 4:22-cv-05990-HSG

**[PROPOSED] ORDER GRANTING
ADMINISTRATIVE MOTION
PARTIALLY SEAL PLAINTIFF'S
MOTION TO NOTICE TERMINATION
OF FILIPPATOS PLLC FOR CAUSE, TO
REQUIRE FILIPPATOS PLLC TO
PROVIDE CLIENT FILE TO
PLAINTIFF, AND TO REQUIRE
FURTHER BRIEFING *EX PARTE***

Re: Dkt. Nos. 176, 176-6, 171, 171-1, 171-4.

[PROPOSED] ORDER GRANTING ADMINISTRATIVE MOTION TO PARTIALLY SEAL PLAINTIFF’S MOTION TO NOTICE TERMINATION OF FILIPPATOS PLLC FOR CAUSE, TO REQUIRE FILIPPATOS PLLC TO PROVIDE CLIENT FILE TO PLAINTIFF, AND TO REQUIRE FURTHER BRIEFING *EX PARTE*

Pending before the Court is the Administrative Motion to Partially Seal Plaintiff’s Motion to Notice Termination of Filippatos PLLC for Cause, to Require Filippatos PLLC to Provide Client File to Plaintiff, and to Require Further Briefing *Ex Parte*, Dkt. No. 176 (the “**Motion for Partial Sealing**”).

Good cause appearing, the Motion for Partial Sealing is GRANTED in its entirety, as supported by the table below.

The Court **ORDERS** that Plaintiff’s Motion to Notice Termination of Filippatos PLLC for Cause, to Require Filippatos PLLC to Provide Client File to Plaintiff, and to Require Further Briefing *Ex Parte*, Dkt. No. 171 (“**Plaintiff’s Motion to Notice Termination of Filippatos**”), and the Declaration of Zoya Kovalenko in Support of Plaintiff’s Motion to Notice Termination of Filippatos, Dkt. No. 171-1 (the “**Kovalenko Declaration ISO Plaintiff’s Motion to Notice Termination of Filippatos**”), may remain partially sealed as filed with redactions.

The Court further **ORDERS** that the document filed as Attachment C to the Kovalenko Declaration ISO Plaintiff’s Motion to Notice Termination of Filippatos, Dkt. No. 171-4, be removed and replaced with the redacted version attached to the Motion for Partial Sealing, Dkt. No. 176-6.

Docket No. Public/(Sealed)	Document	Portions Sought to Be Sealed	Evidence Offered in Support of Sealing	Ruling
Dkt. No. 171/(176-3)	Plaintiff’s Motion to Notice Termination of Filippatos	p. 2 n.2 (ll. 27–28). p. 3, ll. 16–20, 23– 25. p. 4, ll. 1, 3–4, 5, 9– 11. p. 11, ll. 15, 18–28.	Declaration of Zoya Kovalenko in Support of Motion for Partial Sealing, Dkt. No. 176-1 (“ Kovalenko Declaration ISO Motion for Partial ”)	Granted.

		p. 12, ll. 1–9, 11, 14, 24. p. 13, ll. 1, 7–8, 14–15, 16 & nn.9–10 (ll. 23–24, 25, 26–28). p. 14, ll. 15, 17. p. 15, l. 11, & n.11 (ll. 24–26). p. 20, ll. 16–19.	Sealing”) ¶¶ 3–5. Good cause exists to seal this information because it relates to and involves confidential settlement negotiations and mediation proceedings, which, if disclosed, would undermine public interest in encouraging parties to consider out-of-court resolutions.	
Dkt. No. 171-1/(176-4)	Kovalenko Declaration ISO Plaintiff’s Motion to Notice Termination of Filippatos	p. 3, ll. 17–28. p. 4, ll. 1–28. p. 5, ll. 1–28. p. 6, ll. 1–25, 27–28. p. 7, ll. 1–3, 6–12, 17–18. p. 8, ll. 9, 24–28. p. 9, ll. 1–28. p. 10, ll. 1–19. p. 13, ll. 18–22. p. 14, ll. 2–8.	Kovalenko Decl. ISO Motion for Partial Sealing ¶¶ 3–5. Good cause exists to seal this information because it relates to and involves confidential settlement negotiations and mediation proceedings, which, if disclosed, would undermine public interest in encouraging parties to consider out-of-court resolutions.	Granted.
Dkt. No. 171-4* /	Attachment C (Termination	p. 1–3.	Kovalenko Decl. ISO Motion for Partial Sealing	Granted.

<p>(176-5)</p> <p>*176-6 is the redacted version of 176-5 and is to replace the document filed at 171-4.</p>	<p>Email and Response) to Kovalenko Declaration ISO Plaintiff's Motion to Notice Termination of Filippatos</p>		<p>¶¶ 3–5, 8.</p> <p>Good cause exists to seal this information because it relates to and involves confidential settlement negotiations and mediation proceedings, which, if disclosed, would undermine public interest in encouraging parties to consider out-of-court resolutions.</p>	
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IT IS SO ORDERED.

Dated: February __, 2025

HAYWOOD S. GILLIAM, JR.
United States District Judge